UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

JOINT MOTION TO SEAL CERTAIN INFORMATION FILED IN CONNECTION WITH THE PARTIES' SUMMARY JUDGMENT MOTIONS

Pursuant to Local Rule 7.2, the Stipulated Protective Order (Dkt. 55), and this Court's recent order adopting the parties' proposed briefing schedule for resolving disputes relating to confidentiality (Dkt. 409), the parties jointly move this Court for an order sealing (1) portions of the memoranda of law filed in support of their motions for summary judgment; (2) portions of the statements of material fact filed in connection with their motions for summary judgment; and (3) all or part of several of the exhibits filed in connection with their motions for summary judgment. The parties request that any documents filed under seal on June 15 be impounded until further order of the Court.

The parties have met and conferred and determined which materials must be subject to this initial sealing order because one party has indicated the materials must be filed under seal. In accordance with the schedule set by this Court (Dkts. 408, 409), the party seeking to seal material that is the subject of this motion will file a Memorandum of Law in support of this motion on June 22, 2018.

WHEREFORE, the parties respectfully request that the Court grant this motion and that any documents filed under seal on June 15 be impounded until further order of the Court, such that they may be viewed only by the Judge, her clerk(s), and Court personnel in conjunction with the parties' motion for summary judgment.

Respectfully submitted,

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth (BBO #665232) William F. Lee (BBO #291960) WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6687

Tel: (617) 526-6687 Fax: (617) 526-5000

felicia.ellsworth@wilmerhale.com

Seth P. Waxman (pro hac vice)
Paul R.Q. Wolfson (pro hac vice)
Daniel Winik (pro hac vice)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Ave. NW
Washington, D.C. 20006
Tel: (202) 663-6800
Fax: (202) 663-6363
seth.waxman@wilmerhale.com
paul.wolfson@wilmerhale.com

Debo P. Adegbile (pro hac vice)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel: (212) 295-6717
Fax: (212) 230-8888
debo.adegbile@wilmerhale.com

Counsel for Defendant President and Fellows of Harvard College

/s/ Patrick Strawbridge
Patrick Strawbridge BBO #678274
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
Tel: 617-227-0548
patrick@consovoymccarthy.com

William S. Consovoy

Thomas R. McCarthy
Michael H. Park
J. Michael Connolly
Consovoy McCarthy Park PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
Tel: 703-243-4923
Fax: 703.243.4923
will@consovoymccarthy.com
tom@consovoymccarthy.com
park@consovoymccarthy.com
mike@consovoymccarthy.com

Paul M. Sanford BBO #566318 BURNS & LEVINSON LLP 125 Summer One Citizens Plaza, Suite 1100 Providence, RI 02903 Tel: 617-345-3000 Fax: 617-345-3299 psanford@burnslev.com

Counsel for Plaintiff Students for Fair Admissions, Inc.

Dated: June 13, 2018

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth